

**STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
BUREAU OF HEALTHCARE SYSTEMS**

In re: Susan Joy, R.N.

Petition No. 2004-1124-010-099

**STATEMENT OF CHARGES**

Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Susan Joy:

**COUNT ONE**

1. Susan Joy of Fishkill, New York (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut registered nursing license number R45448.
2. At all relevant times, respondent was employed as a registered nurse at Danbury Hospital, Danbury, Connecticut.
3. From about October 2004 through about November 2004, while working as a registered nurse at Danbury Hospital, respondent:
  - a. diverted Dilaudid and/or morphine;
  - b. failed to completely, properly and/or accurately document medical or hospital records; and/or,
  - c. falsified one or more Controlled Substance Receipt Records.
4. From about October 2004 through about November 2004, respondent abused or utilized to excess Dilaudid and/or morphine.
5. Respondent's abuse of Dilaudid and/or morphine does, and/or may, affect her practice as a registered nurse.
6. The above facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-99(b), including but not limited to:
  - a. §20-99(b)(2); and/or,
  - b. §20-99(b)(5).

COUNT TWO

7. Paragraphs 1-3 are incorporated herein by reference as if set forth in full.
8. On November 20, 2002, the Connecticut Board of Examiners for Nursing (hereinafter "the Board") ordered a Consent Order in Petition Number 2002-0628-010-053 (hereinafter "the Order") that placed respondent's registered nursing license on probation for a period of four years. Such disciplinary action was based upon proof of respondent's diversions of Dilaudid and morphine.
9. Said Order specifically provided that respondent shall not obtain or use controlled substances, legend drugs or alcohol in any form unless prescribed or recommended for a legitimate therapeutic purpose by a licensed health care professional authorized to prescribe medications.
10. On about November 10, 2004 respondent's urine screen results were positive for opiates.
11. Respondent's conduct as described above constitutes violations of the terms of probation as set forth in the Order, and subjects respondent's license to revocation or other disciplinary action authorized by the General Statutes of Connecticut, §§19a-17 and 20-99(b).

THEREFORE, the Department prays that:

The Connecticut State Board of Examiners for Nursing, as authorized by the General Statutes of Connecticut, §§20-99(b) and 19a-17, revoke or order other disciplinary action against the license of Susan Joy as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 6<sup>th</sup> day of June 2005.



Jennifer Filippone, Public Health Services Manager  
Office of Practitioner Licensing and Certification  
Bureau of Healthcare Systems